



THE CITY OF NEW YORK  
**LAW DEPARTMENT**

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NEW YORK, NY 10007

Hon. Sylvia O. Hinds-Radix  
Corporation Counsel

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July 19, 2023

**Via First Class Mail and Email**

Joanne C. Thorne-Long  
2121 Union Street, Apt. 2R  
Brooklyn, New York 11212

Re: *Thorne-Long v. The City of New York, et al.*,  
No. 23 Civ. 04305 (DG) (LB)  
LM No. 2023-049801

Dear Ms. Thorne-Long:

I am the Assistant Corporation Counsel in the office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing defendants the City of New York ("City"), Hon. Sylvia O. Hinds-Radix, New York City Department of Education, Mayor Eric Adams, and Commissioner Ashwin Vasan (collectively, the "Defendants").

Pursuant to this Court's individual rules III.B.4, please find attached copies of Defendants' Notice of Motion to Dismiss, Memorandum of Law in Support, Declaration of René L. Macioce, Declaration of Lukeem Hanton, Rule 12.1 Notice, accompanying exhibits, and all unpublished cases cited in the Memorandum of Law in Support.

Respectfully submitted,

/s/ René L. Macioce  
René L. Macioce  
Assistant Corporation Counsel

**CC:** Honorable Diane Gujarati (via ECF)  
United States District Court  
Eastern District of New York